

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE

FILED BY
CJD

JUN 20 2005

AFTER HOURS DEPOSITORY
Robert R. Di Trollo, Clerk
U. S. DIST. COURT
W. D. OF TN, MEMPHIS

ANTHONY E. RAYNOR,

Plaintiff,

JURY DEMANDED

CASE NO. 04-2707

v.

THOMAS H. COULD
CLERK U.S. DISTRICT COURT
W. D. OF TN, MEMPHIS

05 JUL -6 AM 11:24

FILED BY
DE

TENNESSEE AIR NATIONAL GUARD ("TANG")
LIEUTENANT COLONEL JAMES O. HALL, COMMANDER,
TANG; COLONEL GARRY T. HICKS, COMMANDER, TANG;
MAJOR GENERAL GUS I. HARGETT, JR.,
ADJUTANT GENERAL, TENNESSEE NATIONAL GUARD;
LIEUTENANT GENERAL H. STEVEN BLUM, CHIEF,
NATIONAL GUARD BUREAU; LIEUTENANT GENERAL
DANIEL JAMES, III, DIRECTOR, AIR NATIONAL GUARD;
UNITED STATES DEPARTMENT OF THE AIR FORCE;
and JAMES G. ROCHE, SECRETARY OF THE AIR FORCE.

MOTION GRANTED

JON PHIPPS Mc
U.S. DISTRICT

DATE

MOTION GRANTED

JON PHIPPS McALLA
U.S. DISTRICT JUDGE

Defendants.

RESPONSE TO SHOW CAUSE ORDER

July 6, 2005
DATE

Comes now the Plaintiff's counsel, Thelma J. Copeland, and responds to the Court's

Order to show cause as follows:

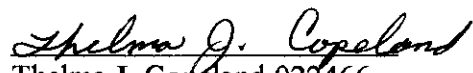
1. Counsels for Plaintiff have three cases in this Court concerning the same Defendant and issues.
2. Counsel mistakenly believed that all three cases were included in the opposition's Motion to Dismiss; and
3. Counsel made a Motion to allow more time to respond to the motions made by the defense; and

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4. Counsel believed all three cases were covered in Counsel's Motion; and
5. Having discovered that this case was not included in the previous motion made by Counsel for Plaintiff;
6. Due to the current work load in that co-counsel has been working on an appellant brief; and
7. The importance of Plaintiff's response to the Motion to Dismiss; and
8. The fact that Plaintiff's case will be severely prejudiced if counsel does not take the necessary time to review before responding to the Motion to Dismiss;
9. Counsel requests additional time until July 31, 2005 to prepare the response to Defendant's Motion to Dismiss as counsels requested in the other two cases involving this Defendant and these issues.

WHEREFORE IT IS REQUESTED that counsel for the Plaintiff be allowed until July 31, 2005 to file Plaintiff's response to the Defendant's Motion to Dismiss.

Respectfully submitted,


Thelma J. Copeland, 022466
217 Exchange Avenue
Memphis, TN 38105
(901) 526-1890

CERTIFICATE OF SERVICE

I, Thelma J. Copeland, do hereby certify that a copy of the foregoing has been mailed to Harriet Holman, Esquire, U.S. Attorney's Office, Suite 800, 167 N. Main Street, Memphis, TN 38103 on this the 20th day of June, 2005.


Thelma J. Copeland



Notice of Distribution

This notice confirms a copy of the document docketed as number 15 in case 2:04-CV-02707 was distributed by fax, mail, or direct printing on July 6, 2005 to the parties listed.

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Honorable Jon McCalla
US DISTRICT COURT